

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

USER ACCOUNT CONFIRMATION AND CONSENT FORM FOR [PLATFORM]

Case Caption and Civil Action No.:

The Plaintiff User named below (and, if the Plaintiff User is a minor or is deceased, the parent or guardian of the Plaintiff User) submits this form pursuant to the User Account Information Order filed in this action.

A. Plaintiff User. This form pertains to [REDACTED], who alleges that they were injured by their use of [Defendant]'s platforms.

B. Confirmation of Accounts. By completing this Form, the Plaintiff User confirms that: (i) the accounts for which “Yes” is selected in the “Registered to Plaintiff User?” column are accounts for which the Plaintiff User is the registered account holder, (ii) the accounts for which “No” is selected in the “Account is Accessible?” column are accounts registered to the Plaintiff User and are inaccessible to the Plaintiff User notwithstanding reasonable and good-faith efforts to regain access, and (iii) the accounts for which “Yes” is not selected in the “Registered to Plaintiff User?” column are accounts not registered to the Plaintiff User.

Username	Registered to Plaintiff	Account is Accessible?
[Imported from Account List]	User? [Yes, No]	[Yes, No]

1
2
3 C. Consent to Disclose Account Contents – Plaintiff User Is Not Deceased. If Plaintiff User
4 answered “No” to “Account is Accessible?” for any Username listed above, and Plaintiff User not
5 deceased, Plaintiff User must complete and sign the following to consent to the disclosure of the
6 contents of Plaintiff’s User Account.
7

8 I, _____, am the registered account holder of the accounts, listed by
9 username, for which I selected “Yes” in the “Registered to Plaintiff User?” column and “No” in the
10 “Account Accessible?” column in the table above. I have reviewed all information, including basic
11 subscriber information, regarding each of these accounts provided in the User Account Identification
12 Form and I have a good-faith belief that I am the registered account holder for all accounts so-identified
13 herein.

14 I have made reasonable and good-faith efforts to regain access to all such accounts using the
15 processes [Defendant] makes available to users to do so but have not regained access. If I have
16 forgotten my password and have access to the email address(es) that could be used to reset my
17 password, I have attempted to reset my password. I expressly and voluntarily consent to [Defendant]’s
18 disclosure of the data and information associated with those accounts in its public account data
19 download tool, or substantially similar tools, to counsel for Defendants and counsel for the Plaintiff User
20 in the above-captioned litigation. I agree that this consent form satisfies 18 U.S.C. § 2702(b)(3), which
21 authorizes Defendants to divulge the contents of communications with the lawful consent of the
22 originator or addressee or intended recipient of such communications.
23

24 I, _____, affirm that the foregoing is true and correct. Executed on
25 _____.
26

27 By: _____
28

Plaintiff User

D. Consent of Parent or Guardian to Disclose Account Contents – Plaintiff User is Deceased. If Plaintiff User is deceased and Plaintiff User’s parent or guardian answered “No” to “Account is Accessible” for any username listed above, a parent or legal guardian must complete and sign the following to consent to the disclosure of the contents of the user account associated with that username.

I, _____, am the parent or legal guardian of the Plaintiff User named above. I expressly and voluntarily consent to [Defendant]’s disclosure of the data and information associated with the accounts for which “Yes” is selected in the “Registered to Plaintiff User?” column and “No” is selected in the “Account Accessible?” column in the table above in [Defendant]’s public account data download tool, or substantially similar tools, to counsel for Defendants and counsel for the Plaintiff User in the above-captioned litigation.

I have reviewed all information readily available to me, including basic subscriber information, regarding each of these accounts provided in the User Account Identification Form and I have a good-faith belief that the decedent user is the registered account holder for all accounts so-identified herein.

To the extent that the Stored Communications Act applies, I agree that this consent form satisfies 18 U.S.C. § 2702(b)(3), which authorizes Defendants to divulge the contents of communications with the lawful consent of the originator or addressee or intended recipient of such communications.

I, _____, affirm that the foregoing is true and correct. Executed on
_____.

[Handwritten signature]

By:

Parent or Guardian